



Otelco Inc, 505 3rd Ave E, Oneonta, AL 35121 Phone: 205 625-3591

May 1, 2017

Kris Monteith
Acting Wireline Competition Bureau Chief
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

**Re: *Protecting and Promoting the Open Internet*, GN Docket No. 14-28,
Connect America Fund, WC Docket No. 10-90, *Developing a Unified
Intercarrier Compensation Regime*, CC Docket No. 01-92**

Dear Ms. Monteith:

Pursuant to the Federal Communications Commission's ("FCC" or "Commission") *Open Internet Order*,¹ War Telephone LLC ("War" or the "Company"), Study Area Code 200258 (WV), hereby notifies the Wireline Competition Bureau ("WCB" or "Bureau") of its intention to cease offering its DSL and Consumer Broadband-Only Loop ("CBOL") broadband Internet transmission service as separate components of its broadband Internet access service effective July 1, 2017. As such, the transmission components will not be provided as separate regulated services and will only be provided as part of the complete broadband Internet access service that the Company offers to end user customers within its West Virginia serving area through the Company.

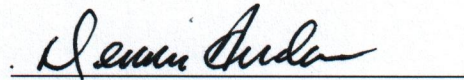
War currently provides DSL broadband Internet transmission service as a tariffed offering pursuant to NECA Tariff F.C.C. No. 5. The only customer for the Company's broadband Internet transmission service is the Company's affiliate nonregulated ISP. Notice to the affiliate ISP was provided this date by interoffice memorandum that the Company will discontinue the offering of broadband Internet transmission service as a separate component of its broadband Internet access service effective July 1, 2017.

¹ *Protecting and Promoting the Open Internet*, GN Docket No. 14-28, Report and Order on Remand, Declaratory Ruling and Order, 30 FCC Rcd 5601, ¶ 460 and n. 1378 (2015).

The Commission made clear in the *Rate-of-Return Connect America Fund Order*,² as well as the *Clarification Order*,³ that a rate-of-return carrier could make the retail offering described in the foregoing first paragraph, and thus the revenues associated with the broadband Internet access transmission would no longer be subject to the federal universal service assessment pursuant to FCC Form 499-A.

Please contact the undersigned if you have any questions,

Sincerely,



Dennis Andrews
Senior Vice President & General Manager
War Telephone LLC

cc: Pamela Arluk, Chief, Wireline Competition Bureau Pricing Policy Division
Special Assistant for Telecommunications at the Department of Defense
The Office of the Honorable Jim Justice Governor of West Virginia
West Virginia Public Service Commission
National Exchange Carrier Association

² *Connect America Fund*, WC Docket Nos. 10-90, et al., Report and Order, Order and Order on Reconsideration and Further Notice of Proposed Rulemaking, FCC 16-33, ¶ 194, n. 428 (rel. Mar. 30, 2016).

³ *Connect America Fund*, WC Docket Nos. 10-90, et al., Order DA 16-661, ¶ 25 (WCB, rel. June 15, 2016) (citing the *Open Internet Order*).

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Notification of Discontinuance of broadband Internet transmission service as a separate component of its broadband Internet access service was served this 1st day of May, 2017 by mailing true and correct copies thereof, postage prepaid, to the following persons:

Secretary of Defense
Attn: Special Assistant for Telecommunications
1000 Defense Pentagon
Washington, D.C. 20301-1000

The Honorable Jim Justice
Office of the Governor
State Capitol, 1900 Kanawha Blvd. E
Charleston, WV 25305

Ingrid Ferrell, Executive Secretary
Public Service Commission of West Virginia
201 Brooks Street
Charleston, WV 25301

National Exchange Carrier Association
80 South Jefferson Road
Whippany, NJ 07981